(Caption of Case)  State Universal Service Support of Basic Local Service Included in a Bundled Service Offering or Contract Offering			BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA  COVER SHEET  DOCKET NUMBER: 2009 - 326 - C			
(Please type or print) Submitted by:  Address: Ellis, Lawhorne & Sims, PA			SC Bar Number: 11208 Telephone: 803-343-12 Fax: 803-799-84 Other:			
	PO Box 2285		n n industra	Nallialand		
NOTE: T	Columbia SC 29202	4 L	Email: jpringle@ellislawhorne.com es nor supplements the filing and service of pleadings or other papers			
as required be filled out of	y law. This form is require completely.	cketing informa	FION (Check all the equest for item to be	olina for the	purpose of docketing and must  Commission's Agenda	
☐ Other:	ency Relief demanded in	petition	peditiously			
	INDUSTRY (Check one) NATURE OF ACTION (Check all that apply)					
Electric		Affidavit	X Letter		Request	
Electric/C	3as	Agreement	Memorandum		Request for Certification	
☐ Electric/Telecommunications		Answer	Motion		Request for Investigation	
Electric/Water		Appellate Review	Objection		Resale Agreement	
Electric/Water/Telecom.		Application	Petition		Resale Amendment	
Electric/Water/Sewer		Brief	Petition for Reconsideration		Reservation Letter	
Gas		Certificate	Petition for Rulema	aking	Response	
Railroad		Comments	Petition for Rule to S	how Cause	Response to Discovery	
Sewer		☐ Complaint	Petition to Intervene		Return to Petition	
▼ Telecommunications		Consent Order	Petition to Intervene Out of Time		Stipulation	
Transport	ation	Discovery	Prefiled Testimony		Subpoena	
☐ Water		Exhibit	Promotion		☐ Tariff	
☐ Water/Sev	wer	Expedited Consideration	Proposed Order		Other:	
Administrative Matter		Interconnection Agreement	Protest			
Other:		Interconnection Amendment	t Publisher's Affidavit			
÷		Late-Filed Exhibit	Report Reset Form			
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# **ELLIS: LAWHORNE**

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Direct dial: 803/343-1270
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August 17, 2009

## FILED ELECTRONICALLY

Charles L. A. Terreni, Esq.
Chief Clerk and Administrator
Public Service Commission of South Carolina
Synergy Business Park
Saluda Building
101 Executive Center Dr., Suite 100
Columbia, SC 29210

RE: Docket No. 2009-326-C, State Universal Service Support of Basic Local Service Included in a Bundled Service Offering or Contract Offering – Sprint's Position Statement

Dear Mr. Terreni:

Pursuant to the Commission Hearing Officer Directive, issued July 31, 2009 in Docket No. 1997-239-C, Sprint Communications Company L.P. ("Sprint") submits this position statement regarding whether basic local service should receive State Universal Service support when it is included in a bundled service offering or contract offering. Sprint's position is that subsidies, whether received through a state Universal Service Fund or through an ILEC's inflated intrastate switched access rates, are anti-competitive and must be eliminated or minimized to the greatest extent possible. Limiting eligibility for state USF subsidies to only those ILEC customer lines that use stand-alone basic service is an obvious first step toward minimizing subsidies. It would also recognize the fact that these carriers have numerous additional sources of revenue available from these lines other than basic local voice service. Accordingly, Sprint and the people of South Carolina would benefit from not unduly enriching incumbent carriers by limiting state USF subsidy payments to the subset of customer lines that represent stand-alone basic local service.

Thank you for your assistance, and please call me if you should have any questions regarding this matter.

Sincerely,

John J. Pringle

JJP/cr

cc: Parties of Record (via electronic mail service)

William R. Atkinson, Esq. (via electronic mail service)

#### **BEFORE**

#### THE PUBLIC SERVICE COMMISSION OF

#### **SOUTH CAROLINA**

#### **DOCKET NO. 2009-326-C**

State Universal Service Support of Basic	)	
Local Service Included in a Bundled	)	CERTIFICATE OF SERVICE
Service Offering or Contract Offering	)	

This is to certify that I have caused to be served this day, one (1) copy of the August 17, 2009 Letter to The Honorable Charles L.A. Terreni (Sprint's Position Statement) by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed thereto and addressed as follows:

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Columbia, South Carolina August 17, 2009